

State Water Resources Control Board

September 20, 2018

(Via email and Certified Mail)

CERTIFIED MAIL

NO. 7017 2680 0000 6195 9029

Mr. Brahman Conci
Superintendent of Facilities Operations
City and County of San Francisco
1990 Newcomb Avenue
San Francisco, California 94124
bconci@sfwater.org

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEM
LOCATED AT CITY AND COUNTY OF SAN FRANCISCO CLARENDON PUMP
STATION, 201 LAGUNA HONDA BOULEVARD, SAN FRANCISCO**

Dear Mr. Conci:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the UST at your facility on September 12, 2018, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Maintain Facility Information – In CERS, the Facility Operating Permit Application indicates State Fund and CFO letter as the financial responsibility mechanism; however, the facility is using a Local Government Mechanism and Bond Ratings.	Diesel	September 12, 2018	Ongoing	23 CCR 2711(a)
2	Failure to Maintain Monitoring Plan – In CERS, the monitoring plan indicates that an Automatic Tank Gauge (ATG) is used for monitoring the tank; however, an annular sensor is being used as the monitoring method.	Diesel	September 12, 2018	Ongoing	H&SC 25286(a); 23 CCR 2632(d)(1)

No.	Violation	Tank	Start Date	Stop Date	Regulation
3	Failure to Maintain Plot Plan/Site Map – In CERS, the site map does not include the location of underground piping for the UST system.	Diesel	September 12, 2018	Ongoing	23 CCR 2711(a)(8)
4	Failure to Meet Designated Operator (DO) Requirements – The May monthly DO inspection was not performed.	Diesel	May 1, 2018	May 31, 2018	23 CCR 2715(c)
5	Failure to Maintain Financial Responsibility – The Bond Rating that is currently being used is outdated and is required to be updated every 12 months. Additionally, the Certificate of Financial Responsibility was not present or uploaded to CERS at the time of inspection.	Diesel	September 1, 2011	Ongoing	H&SC 25292.2; 23 CCR 2711(a)(11)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and San Francisco City & County Public Health Department within sixty (60) days from the date of this letter. Have your DO make specific notations in the next monthly DO report indicating the ongoing violations have been corrected. The monthly DO report and any associated photos must be submitted as proof of compliance.

Please send all compliance documentation to the following:

State Water Board

Mr. Joseph Lovesee
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, Suite 2300
Sacramento, California 95814
joseph.lovesee@waterboards.ca.gov

Local CUPA

Mr. Jin Tang
Senior Environmental Health Inspector
San Francisco City & County Public
Health Department
1390 Market Street, Suite 210
San Francisco, California 94102
jin.tang@sfdph.org

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,



Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: (via email only)

Ms. Paula Stewart
Program Manager
San Francisco City & County
Public Health Department
paula.stewart@sfdph.org